

California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Furthermore, “the identical invention must be shown in as complete detail as is contained in the claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Applicant’s quick release socket (10) is not disclosed by Hume. In prior art sockets, the electrical sockets are made inside of a completely sealed unitary socket housing. The inventor has determined that electrical failure occurs primarily in the portion of the socket where the light bulb plugs into the socket. Since the electrical connections are inside the unitary socket body, replacement is difficult and time consuming because the entire device must be replaced and another device reinstalled. In order to overcome this problem, Applicant developed the present invention which is comprised of a light socket that is separable from the light bulb. This allows for the replacement of the socket alone in the event of failure rather than the entire device.

Specifically, Applicant’s invention discloses a quick release socket (10) which is an entirely separate piece from the light bulb. (See Figs. 4a-4c). The quick release socket (10) is designed with a conical shaped housing (11) with a circular bottom (13) and top (14). The top of the socket (15) is designed with two holes (19) containing contact points allowing for the light bulb prongs to be inserted and thereby attached and easily removed from the socket. The bottom end (13) of the socket, on the other hand, includes a circular insert column (16) and two electrical contact posts (12) designed to be received by the quick release base (20). The socket’s (10) dual end configuration allows both the light bulb attached to the top (15) and base (20) attached at the bottom (13) to be easily removed from the socket (10). Furthermore, since the socket housing (11) only encompasses the socket and does not encase either the light bulb or quick release base, in the event of failure, only the piece which is damaged need be removed and replaced.

In contrast, Hume discloses a unitary light bulb and socket fixture in which the light bulb may not be separated from the socket. Specifically, Hume recites that “[t]he reflector lamp (40) has a bulb (42) set into the reflector (44) and includes an integral stem (46) of circular cross-

section.” (Col. 2, lines 21-22). The Examiner states in the Office Action that the reflector (44) in Hume discloses Applicant’s quick release socket (10) and element (60) in Hume discloses the light bulb attachment means (18). It is apparent, however, from the figures in Hume that the reflector (44) and integral stem (46) are inseparable and comprise a unitary element. (See Figs. 2, 3). The portion where the light bulb would plug into the socket is therefore completely sealed within the reflector (44) and integral stem (46) housing apparatus. Integral stem (46) and reflector (44) are therefore not separable elements, instead they are part of a unitary socket and lightbulb housing configuration. Accordingly, in the event of electrical failure, the entire bulb and socket, including element (60) must be removed and replaced. In contrast, Applicant’s invention permits replacing the electrical contacts without replacing the light bulb. Hume requires the use of a specially designed light bulb having an integral stem. Applicant’s invention operates with various kinds of light bulbs already existing in the market.

Furthermore, in contrast to the attachment means (18) disclosed in Applicant’s invention, in Hume attachment means (60) is affixed to reflector (44), contrary to how it would have to be if reflector (44) were the same element disclosed by Applicant’s quick release socket (10). Instead, attachment means (60) is found completely encased within the integral stem (46) and does not act to secure the light bulb to the socket (44). Rather, the bulb filaments (58) contact the molybdenum contacts (60) and the “bulb (42) is itself held within the stem (46) by cement or by a cylindrical ceramic plug (62).” (Hume, Col. 3, lines 39-43). Accordingly, since the bulb (42), reflector (44), integral stem (46) and contacts (60) are a single unit and may not be separated from one another they do not disclose Applicant’s quick release socket (10) and attachment means (18) which are separable from the light bulb (30).

Applicant respectfully submits that, in light of the above, claim 1 is allowable over

Hume. The cited prior art does not disclose the claimed limitation of the quick release socket of claim 1. In light of Applicant's traversal of the Examining Attorney's rejection of claim 1, Applicant respectfully requests that a notice of allowance be issued.

2. Anticipation of claim 1 under 35 U.S.C. § 102(b) by Reedy

Applicant respectfully submits that claim 1 is not anticipated by Reedy because Applicant's claimed quick release socket (10) and quick release base (20) are not found in Reedy. The Examiner contends that Applicant's quick release socket comprising two electrical contact posts is disclosed by elements (54), (112) and (118) of Reedy. The Examiner further states in the Detailed Action that the quick release base with electrical contact slots is disclosed by elements (15), (94) and (96) of Reedy. Elements (112) and (118) of Reedy are disclosed as having tapered ends (Col. 4, lines 27-25, lines 37-38) such that they may be axially inserted into slots within the socket body (15). (Col. 5, lines 52-54). Furthermore, spring arms (58) and (60) are formed on the separate socket insert (54) in order to secure the socket insert (54) within the socket body (15). (Col. 6, lines 1-5). The feed terminals (94,96), must be shaped in the form of slots complimentary to that of the blades in order to receive the blades (112) and (118). The elements are then joined with one another by being pushed together. Reedy does not disclose the elements of a shape that would allow them to be secured together or easily removed by a twisting motion. In addition, the relative movement of flexion of spring arms (58) and (60) introduces wear and tear that can result in failure of the device in Reedy.

In contrast, Applicant's claimed socket (10) comprising electrical contact posts (12) and base (20) comprising contact slots (22), are designed such that they may be secured and released from one another by inserting one within the other and twisting. Applicant's contact posts (12) consist of a narrow column (46) which is attached to the bottom of the socket (10) and end caps (48) on the end distant from the socket bottom of a diameter slightly larger than the narrow column (46). (p.6, lines 23-25). The electrical contact slots (22) within the base inner cavity (28)

consist of circular openings (42) and narrow grooves (44) connected to the circular opening. (p.7, lines 5-7). The socket and base are then secured to one another by inserting the contact posts (12) into the circular openings (42). The socket is then rotated such that the narrow columns (46) of the contact posts (12) move along the narrow grooves (44) of the electrical slots (22) ultimately locking the base to the socket and securing the electrical connection. (p. 7, lines 15-20). A socket and base which may be electrically connected and secured together in such a manner is not disclosed in Reedy. In contrast to Reedy, Applicant's invention has no parts which move or flex, therefore reducing the potential for wear and tear.

Applicant respectfully submits that, in light of the above, claim 1 is allowable over Reedy. The cited prior art does not disclose the claimed limitations of a quick release socket and base of claim 1. In light of Applicant's traversal of the Examining Attorney's rejection of claim 1, Applicant respectfully requests that a notice of allowance be issued.

Claim Rejections - 35 U.S.C. § 103(a)

The Examiner rejected claim 2 in the Detailed Office Action under 35 U.S.C. § 103(a) as being unpatentable over Hume et al. (US 5,542,857) in view of Jones et al. (US 6,053,623).

Applicant respectfully traverses the rejection of claim 2. Applicant respectfully submits that the claim 2 is not obvious over Hume in view of Jones et. al. for at least the reasons set forth below.

Accordingly, Applicant respectfully requests allowance of claim 2 as amended.

Claim 2

Applicant respectfully submits that with respect to the referenced prior art there is no suggestion or motivation to combine Hume et. al and Jones et. al. therefore a *prima facie* case of obviousness has not been established. Applicant respectfully submits that in order for the Examiner to show that a *prima facie* case of obviousness exists, (1) there must be some suggestion or motivation to combine the references, (2) a reasonable expectation of success; and (3) the prior art references must teach or suggest all the claim limitations. MPEP §706.02(j).

Furthermore, although references are capable of being combined, the resultant combination may not be found obvious unless there is some suggestion in the prior art of the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 U.S.P.Q.2d 1430 (Fed. Cir. 1990).

The Examiner states in the Detailed action that Hume discloses all the limitations of Applicant's invention except for the light bulb attachment means being designed to accommodate an MR-16 light bulb. The Examiner therefore relies on Jones et. al. in rendering Applicant's invention obvious stating Jones et. al. discloses a light bulb attachment means designed to accommodate an MR-16 lightbulb. The Examiner further states such a combination would have been obvious to one skilled in the art in order to utilize the quick connection of MR-16 bulbs.

Applicant respectfully submits however that in light of the above arguments, Hume does not disclose Applicant's claimed quick release socket. Since Jones et. al. also does not disclose this element, the combination does not suggest all the limitations of Applicant's invention therefore a prima facie case of obviousness may not be established.

Furthermore, even if the Examiner determines Applicant's claimed quick release socket is disclosed by Hume, if the Examiner wishes to rely on the knowledge of those skilled in the art as a basis for finding the motivation to combine the references, the Examiner must set forth some objective reason such as the principle or specific understanding of one skilled in the art which would provide motivation to combine the references. See *In re Kotzab*, 217 F.3d 1365, 1371, 55 USPQ2d 1313, 1318 (Fed. Cir. 2000). Applicant respectfully submits the Examiner has failed to set forth such an objective reason in the Detailed Action. The Examiner's statement that one skilled in the art would have found the combination obvious "to utilize the quick connection of MR-16 bulbs" does not satisfy this requirement. Although the Examiner has identified an advantage of such a combination the Examiner has not set forth a principle or understanding of one skilled in the art that would motivate one to combine Hume with Jones. Indeed, Hume

teaches against the suggested combination because it discloses a unitary reflector (44) and base stem (46). There is no manner in which an MR-16 bulb can be used in Hume's invention. If such a modification were obvious, those skilled in the art would have recognized it before now.

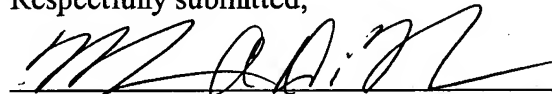
Applicant respectfully submits therefore, in light of the above, claim 2 is allowable over Hume in view of Jones et. al. The cited combination does not disclose the claimed limitation of the quick release socket in combination with an MR-16 light bulb of claim 2 and in the alternative, the Examiner has not set forth an adequate basis for combining the references. Accordingly, a prima facie case of obviousness has not been established. In light of Applicant's traversal of the Examining Attorney's rejection of claim 2, Applicant respectfully requests that a notice of allowance be issued.

CONCLUSION

In light of the above statements, Applicant respectfully requests reconsideration and allowance of all pending claims. The Examiner is invited to contact Applicant's attorney if an interview would expedite prosecution of this matter.

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Respectfully submitted,



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